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 THE UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT FOR THE
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

WILLIAM A. ZIETZKE,)	Case No. 4:19-cv-03761-HSG
)	
Petitioner,)	STIPULATION TO FURTHER EXTEND
)	TIME FOR PETITIONER TO RESPOND
v.)	TO GOVERNMENT'S MOTION FOR
)	SUMMARY DENIAL OF PETITION TO
UNITED STATES OF AMERICA,)	QUASH AND FOR ENFORCEMENT OF
)	INTERNAL REVENUE SERVICE
Respondent.)	SUMMONS AND TO MODIFY
)	BRIEFING SCHEDULE

1 **IT IS HEREBY STIPULATED AND AGREED** by and between Petitioner William A.
 2 Zietzke (“Zietzke”) and Respondent United States of America (“United States”), through their
 3 undersigned counsel, that Zietzke may have a one-week extension of time to respond to the United
 4 States’ “Motion for Summary Denial of the Petition to Quash and for Enforcement of the Internal
 5 Revenue Service Summons” (“Motion”) served on Coinbase, Inc. in this case, from October 11,
 6 2019, to October 18, 2019, and that the time for the government to file its Reply, if any, to such
 7 Response be extended from October 18, 2019, to November 1, 2019. In support of this Stipulation,
 8 the parties state as follows:

- 10 1. On September 13, 2019, the government filed its Motion (Doc. 10).
- 11 2. Under the current briefing schedule, Zietzke’s Response in opposition to the Motion is
 12 due on October 11, 2019, and the government’s reply to such Response is due on October 18, 2019.
 13 This is the parties’ second request for an extension of the briefing schedule in this case. Pursuant
 14 to the Order filed on September 30, 2019, this Court extended the briefing schedule by two weeks.
 15 3. Zietzke requires a short extension of time to file his Response for two reasons. *First*, on
 16 Thursday, October 3, 2019, Zietzke’s counsel Richard G. Stack and his new firm, Wilson Tax Law
 17 Group, was retained by a client (Adam Pacheco) of his former law firm (Brager Tax Law Group) to
 18 represent him in a Federal Indictment filed in Las Vegas on October 1, 2019, for wire fraud, money
 19 laundering, currency structuring, and conspiracy to commit those alleged offenses, in the action
 20 titled *United States v. Adam Pacheco and Harolyn Landau*, Case No. 2:19-cr-00248-KJD-DJA
 21 (D.Nev.). On the afternoon of Friday, October 4, 2019, the lead prosecutor in that action informed
 22 Mr. Stack that an Arrest Warrant had been issued for Mr. Pacheco and that Pacheco had until only
 23 10:00 a.m. on Monday, October 7, 2019, to self-surrender to the U.S. Marshal’s Office in Las
 24 Vegas. Accordingly, Mr. Stack was required to make arrangements to travel to Las Vegas on
 25 October 6, 2019, and he handled the self-surrender and the late-afternoon initial appearance of Mr.
 26 Pacheco in Nevada District Court on October 7, 2019. Thereafter, Mr. Stack was required to

1 expend considerable time working on the Pacheco case, including familiarizing himself with the
2 facts of that case (as the investigation had gone dormant after February 2019, while Mr. Stack was
3 still at Brager Tax Law Group), and seeking to obtain local counsel for Mr. Pacheco, as required by
4 the Local Rules of the District Court of Nevada. Consequently, Mr. Stack was unable to devote his
5 efforts toward completing the Response filed in this case while he was in Las Vegas and/or worked
6 on the Pacheco case earlier this week. *Second*, it has taken Petitioner's counsel longer than
7 anticipated to complete the Opposition due to the factual and legal complexity of this case. To
8 counsel's knowledge, this case (along with a similar case that Zietzke filed against the United
9 States in the Western District of Washington involving a different IRS summons, Case No. 2:19-
10 cv-1234-JCC) is the first fully-contested IRS summons matter involving cryptocurrency records,
11 which Petitioner contends implicates digital privacy issues.
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14 4. Accordingly, the parties request that the Court approve this Stipulation and that it
15 extend the dates for the parties to file their briefs in this case, as follows:

- 16 a. The last day for Zietzke to file his Response in opposition to the government's
17 Motion is October 18, 2019.

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Stipulation to Further Extend Time for Response to Gov't
Motion for Summary Denial of Petition to Quash ,etc.
Case No. 5:19-cv-03761-HSG

b. The last day for the government to file its Reply, if any, to the Motion will be
November 1, 2019.

Dated: October 11, 2019

Respectfully submitted:

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By: /RGS/
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Dated: October 11, 2019

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